

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA
Plaintiff,

v.

GEORGIANNA A.M. GIAMPIETRO
Defendant.

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Case No.: 2:19-cr-00013

Chief Judge Waverly D. Crenshaw, Jr.

**DEFENDANT’S REPLY IN SUPPORT OF HER MOTION FOR A
DAUBERT HEARING PRIOR TO ADMISSION OF CATHERINE SCHRECK**

Whether this Court should permit Catherine Schreck to testify as an expert in this case boils down to two questions:

1. Is Ms. Schreck qualified to testify about how certain entities use the internet to solicit funds for terrorist organizations?
2. Are the methods employed by Ms. Schreck and the SITE Intelligence Group reliable?

Both questions require a *Daubert* hearing.

QUALIFICATIONS

In its opposition to Ms. Giampietro’s motion, the government takes pains to exaggerate the qualifications and experience of Catherine Schreck. And it uses the status and research of Ms. Schreck’s employer, for whom she has only worked three years, as a substitute for her own expertise. But proximity to expertise does not qualify a witness as an expert herself. Based on the information provided to date, Ms. Schreck is not qualified to testify about “how [entities like The Merciful Hands and Alsadaqah] operate on the Internet to solicit funds and other support for foreign fighters affiliated with FTOs.” Opp’n 7. This Court should hold a *Daubert* hearing so that the defense and the Court may scrutinize whether Ms. Schreck has the necessary qualifications or whether she is a mere stand-in for her employer, SITE Intelligence Group and Rita Katz.

The law regarding expert qualifications is clear. Ms. Giampietro agrees with the government that the relevant issue is whether Ms. Schreck's qualifications "provide a foundation for [her] to answer a specific question." *Berry v. City of Detroit*, 25 F.3d 1342, 1351 (6th Cir. 1994) (emphasis added); 29 CHARLES A. WRIGHT ET AL., FEDERAL PRACTICE & PROCEDURE § 6265 (1977) (noting that "qualification to testify as an expert [] requires that the area of the witness's competence matches the subject matter of the witness's testimony").

On November 5, 2021, the government submitted Ms. Schreck's CV, which states that she has "over three years of experience in open-source intelligence, data collection, documentation, and interpretation." Catherine T. Schreck CV, Doc. 316.1. In the government's opposition, however, Ms. Schreck now "has over ten years of combined educational and employment experience related to her proposed areas of testimony in this case, namely opensource intelligence, data collection, documentation, and interpretation of terrorist communications, with a focus on al-Qaeda in Syria and the Middle East." Opp'n 6. This vague and misleading characterization, also repeated in the SITE Report¹ submitted last week, does not reflect the actual education and experience described in Ms. Schreck's CV. A careful review of her CV shows that she does not have the necessary foundation to answer the specific questions the government proposes.

Ms. Schreck graduated with a BA in International Affairs in 2010. Doc. 316.1. During college she interned in the Iraqi Embassy and the Jordanian Interfaith Coexistence Research Centre. *Id.* As an intern at the Embassy (for six months), she researched the topics of "health and education in Iraq and Iraqi students in the United States." *Id.* As an intern at the Jordanian Research Centre, she assisted with creating proposals for interfaith conferences and researched various interfaith projects. *Id.* In contrast to the government's claim, there is no evidence that Ms. Schreck

¹ The full name of the report is "Testimony by Catherine Schreck of the SITE Intelligence Group".

obtained any particular knowledge about extremism, terrorist organizations, or jihadist activities online while she was an undergraduate. *See* Opp’n 6.

Ms. Schreck obtained an MA in International Relations in 2014. Doc 316.1. The government claims that she “concentrated her studies on the Iraq Wars as well as security issues in the region.” Opp’n 6. Her CV does not reflect any concentration; the defense is simply left to take the government’s word for it. During the time that she was presumably working on her MA, she worked as an “International Media Editor” with Kantar Media. Doc 316.1. Her CV states that in this role she performed “commercial media analysis, research, reportage, and translation” in various languages. *Id.* From her description alone, it is difficult to determine what Ms. Schreck actually did at Kantar, and the defense has been unable to find any other employees from Kantar with that title to understand the knowledge and skill it requires.

Ms. Schreck’s CV contains a five and a half year gap in employment after Kantar and before SITE. Doc. 316.1. During that time, she obtained her MS in Empires, Colonialism and Globalisation.”² *Id.* Her dissertation was titled, *The Djebel Druze and the Great Syrian Revolt, 1925-1927*.³ *Id.* The defense has been unable to locate a copy of this document or to determine whether it was published or peer reviewed.⁴ Her LinkedIn account fills the employment gap, indicating that from May 2016 until July 2018, Ms. Schreck worked as a “Program Manager” for the African Education Program, a nonprofit that promotes scholarships and education to Zambian youth. *Catherine Schreck*, LINKEDIN, <https://www.linkedin.com/in/catherineschreck/> (last visited

² According to the London School of Economics and Political Science website, a Masters in Empires, Colonialism & Globalisation “focuses on the history of the non-European world through the study of imperialism, colonialism and the forces that have brought about globalization.” *Graduate Programmes*, LONDON SCH.OF ECON. & POL. SCI., <https://www.lse.ac.uk/study-at-lse/Graduate/degree-programmes-2022/MSc-Empires-Colonialism-and-Globalisation> (last visited Jan 7. 2022).

³ Based on its title, her dissertation focused on a revolt in French-controlled territories in Syria in the late 1920s.

⁴ Her CV identifies, and the defense can find, no peer reviewed publications, articles, books, or presentations attributable to Ms. Schreck.

Jan. 7, 2021). In that role, she primarily created social media marketing campaigns to obtain donations and managed the organization's social media platforms. *Id.* There is no evidence that this work involved terrorist groups or jihadist online activity.

Nothing in Ms. Schreck's CV, LinkedIn, or other online presence suggests that she had any experience or knowledge relating to "jihadi online networks" until after she began working at SITE in July 2018. Nowhere in her CV or her LinkedIn does she describe her educational specialization or experience as "security studies," or "extremist Islam," or "al-Qaeda in Syria and the Middle East" as the government proclaims. Thus, the government's conclusion that "by the time she joined SITE Intelligence Group in 2018, Ms. Schreck was well versed in jihadist activities and the numerous organizations operating in the Middle East and their online and social media infrastructure" is simply unsupported by the information provided to the Court and the defense.⁵

The SITE Report spends considerable time discussing the background and methodology of SITE and Rita Katz.⁶ SITE Report at 2-3. But Ms. Schreck had no involvement in the creation of SITE's methodology. Causing more confusion, while the report says she is the Team Lead of Terrorism and Finance, her CV states that she is the Team Lead of Far-Right/Far-Left. Doc. 316.1. The latter team focuses on the ideologies and activities of domestic and political terrorist groups, not FTOs or jihadist groups.⁷

⁵ To the extent that Ms. Schreck's CV inexplicably omitted critical details about her qualifications, such as a purported "specialization in security studies" or study of "extremist Islam," this only highlights why a *Daubert* hearing is necessary.

⁶ The report describes Ms. Katz as "one of the world's most credible terrorism and extremism experts." SITE Report at 3. It is unclear whether she has ever testified as an expert witness. Ms. Schreck has never testified on any subject and is not regarded as an expert in the field.

⁷ SITE focuses on the following areas: Jihadist Threat, Far-Right/Far-Left, Bioterrorism, Southeast Asia, Central Asia, Finance, Energy, and Tech & Terrorism. SITE INTEL. GRP., <https://ent.siteintelgroup.com/> (last visited Jan. 7, 2022); *Far-Right/Far-Left*, SITE INTEL. GRP., <https://ent.siteintelgroup.com/Articles/Far-Right/-Far-Left-Threat/> (last visited Jan. 7, 2022).

Ms. Giampietro does not doubt that Ms. Schreck has more knowledge than the average person about International Relations, various foreign languages, the Middle East, and the Syrian Revolt of 1925. But Ms. Schreck's education and experience do not appear to provide a sufficient foundation to qualify her as an expert in this case. Ms. Giampietro requests a *Daubert* hearing.

RELIABILITY

The government submitted the SITE Report a few days before it filed the opposition. The report describes SITE's methodology as follows: "follow, collect, save, and analyze terrorist and extremist online content through targeted and mapped navigation of networks using human intelligence, rather than through artificial intelligence or randomly aimed cold searches on the Internet." SITE Report at 3. Basically, SITE analysts review the online activity of groups and individuals that SITE and/or the analyst deems as "terrorism and/or violent extremism." *Id.* The methodology described in the SITE Report raises several questions regarding reliability. For example, it does not explain its "selection criteria," nor does it describe the method for "targeted and mapped navigation of networks using human intelligence." *Id.* It does not explain how it ensures that its analysts have found all relevant content given the vast amount of publicly available information. It does not explain how it determines whether content or sources are irrelevant or untrustworthy. It does not explain if the methods used by its analysts to search for and collect content are capable of repetition with any level of certainty. It does not describe how it accounts for or attempts to minimize the impact of bias on the part of its "human intelligence." With the information the parties and Court have now, it is impossible to know if Ms. Schreck and SITE have cherry-picked content or whether the report reflects an accurate picture of any individual, group, or activity. These unanswered questions highlight several reliability concerns and require a *Daubert* hearing.

Respectfully submitted this 7th day of January, 2022,

By: /s/ Charles Swift
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 7th day of January, 2022, I electronically filed the foregoing **Defendant's Reply in Support of Her Motion for a Daubert Hearing Prior to Admission of Catherine Schreck** with the Clerk of the Court using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

By: /s/ Charles Swift
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Attorney for Giampietro